

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

PHILLIP DANIEL, on behalf of himself and)
all others similarly situated,)
)
Plaintiffs,)
)
v.)
)
STERICYCLE, INC.; and SHRED-IT USA,)
LLC,)
)
Defendants.)

CA No. 3:20-cv-00655-RJC-DCK

**JOINT NOTICE TO ADVISE THE COURT THE PARTIES HAVE REACHED AN
AGREEMENT IN PRINCIPLE TO RESOLVE ALL INDIVIDUAL, COLLECTIVE AND
CLASS-WIDE WAGE-RELATED CLAIMS AT ISSUE IN THIS LITIGATION**

NOW COME the Parties, jointly, by and through their counsel, having reached a settlement in principle, to resolve this matter in its entirety, including the remaining wage-related claims asserted by the Named Plaintiff on behalf of himself and all others alleged to be similarly situated during the relevant time period, including the FLSA Opt-in Plaintiffs and members of the putative Rule 23 Class, pursuant to the Fair Labor Standards Act (“FLSA”), the North Carolina Wage and Hour Act (“NCWHA”) and Rule 23 of the Federal Rules of Civil Procedure. The Parties’ agreement in principle is contingent upon reaching a final agreement on all material terms of settlement and the memorialization of those terms to a formal settlement agreement that the Parties will begin negotiating immediately. Named Plaintiff currently anticipates filing an Unopposed Motion for Preliminary Approval of Class-Wide Settlement, Proposed Settlement Agreement, and all other related documents to the Court, within thirty (30) days from the date of this filing, or no later than July 10, 2023.

Respectfully submitted this June 9, 2023.

/s/ Gilda Adriana Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2023, I electronically filed the foregoing true and accurate copy of the **JOINT NOTICE TO ADVISE THE COURT THE PARTIES HAVE REACHED AN AGREEMENT IN PRINCIPLE TO RESOLVE ALL INDIVIDUAL, COLLECTIVE, AND CLASS-WIDE WAGE-RELATED CLAIMS AT ISSUE IN THIS LITIGATION** with the Court using the CM/ECF system, and have thereby electronically served the document to the following:

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